



AUG 05 2020

UPS Tracking #1ZE93A020196303042

July 30, 2020

USEPA Region VIII Director
Air & Toxics Technical Enforcement Program
Office of Enforcement, Compliance and Environmental Justice, Mail Code 8ENF-AT
1595 Wynkoop Street, Denver CO 80202-1129

RE: Semi-annual Reports (NSPS Subparts OOOO & OOOOa)
Gilcrest Gas Plant (Permit#07WE0881)

Dear Sir or Madam:

Attached are Semi-annual Reports (SAR) covering the Leak Detection and Repair program (LDAR) for the Gilcrest Gas Plant, located in Weld County, Colorado. The reports cover the period from January 1, 2020 through June 30, 2020, and include LDAR programs for the following regulations:

- NSPS Subpart OOOO

Reporting for NSPS Subpart OOOOa has been completed through the EPA's Compliance and Emissions Data Reporting (CEDRI) system pursuant to 40 CFR §60.5422a(b).

To meet the requirements of 40CFR§60.4(a), 40CFR§60.487(a) and Colorado Regulation Number 6, these reports have been submitted in duplicate to the Colorado Department of Public Health & Environment.

Please let me know if you need further information or have additional questions. I may be reached by email at gstahnke@akaenergy.com, or by phone at (720) 946-0244.

Sincerely,

Graham Stahnke
Sr. Environmental Compliance Specialist
Aka Energy Group, LLC

Attachments

cc: Colorado Department of Public Health & Environment, APCD-SS-B1, 4300 Cherry Creek Drive South, Denver, CO 80246
(Submitted via email: cdphe.nspsoooo@state.co.us)

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS

SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000

Company: **AKA ENERGY - GILCREST**

Compliance Group: **CO2 Membrane Process**

Reporting Period: **1/1/2020 Through 6/30/2020**

7/7/2020

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	1	1	0	0	1	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March	18 hours	3/19/20 2:00 PM-3/20/20 8:00 AM Full Plant Emergency Shutdown due to Xcel Power Outage No Components Repaired
April		
May		
June		



60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2019	Current Period Ending: 6/30/2020
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	48	47
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	0	0
Connectors 60.5422(a) & 60.487a (b)(5)	137	133
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/7/2020

Report Parameters



Reg: EPA60-0000

Compliance Grp: CO2 Membrane Process

Class: All Component Classes

Date: 1/1/2020 - 6/30/2020

Compliance Group	Class Description	Added	Deleted
CO2 Membrane Process	CONNECTOR	0	4
CO2 Membrane Process	POTENTIAL OPEN END	0	0
CO2 Membrane Process	PRESSURE RELIEF DEVICE	0	0
CO2 Membrane Process	VALVE	0	1

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000

Company: **AKA ENERGY - GILCREST**

Compliance Group: **Compression Process**

Reporting Period: **1/1/2020 Through 6/30/2020**

7/7/2020

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	3	2	2	0	3	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	1	1	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	1	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March	18 hours	3/19/20 2:00 PM-3/20/20 8:00 AM Full Plant Emergency Shutdown due to Xcel Power Outage No Components Repaired
April		
May		
June		



60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2019	Current Period Ending: 6/30/2020
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	364	365
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	4	4
Connectors 60.5422(a) & 60.487a (b)(5)	2,487	2,486
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/7/2020

Report Parameters



Reg: EPA60-0000

Compliance Grp: Compression Process

Class: All Component Classes

Date: 1/1/2020 - 6/30/2020

Compliance Group	Class Description	Added	Deleted
Compression Process	COMPRESSOR	0	0
Compression Process	CONNECTOR	1	2
Compression Process	POTENTIAL OPEN END	0	0
Compression Process	PRESSURE RELIEF DEVICE	0	0
Compression Process	PUMP	0	0
Compression Process	VALVE	1	0

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000

Company: **AKA ENERGY - GILCREST**

Compliance Group: **Cryogenic Process**

Reporting Period: **1/1/2020 Through 6/30/2020**

7/7/2020

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	2	0	0	1	1
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February	2 hours	2/27/20 8:00 AM-2/27/20 10:00 AM Partial Cryo Shutdown No Components Repaired
March	18 hours	3/19/20 2:00 PM-3/20/20 8:00 AM Full Plant Emergency Shutdown due to Xcel Power Outage No Components Repaired
April		
May		
June		



60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2019	Current Period Ending: 6/30/2020
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	275	276
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	0	0
Connectors 60.5422(a) & 60.487a (b)(5)	932	933
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/7/2020

Report Parameters



Reg: EPA60-0000

Compliance Grp: Cryogenic Process

Class: All Component Classes

Date: 1/1/2020 - 6/30/2020

Compliance Group	Class Description	Added	Deleted
Cryogenic Process	CONNECTOR	1	0
Cryogenic Process	POTENTIAL OPEN END	1	0
Cryogenic Process	PRESSURE RELIEF DEVICE	0	0
Cryogenic Process	PUMP	0	0
Cryogenic Process	VALVE	1	0

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000

Company: **AKA ENERGY - GILCREST**

Compliance Group: **Inlet Gas Process**

Reporting Period: **1/1/2020 Through 6/30/2020**

7/7/2020

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	6	0	0	0	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	1	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March	18 hours	3/19/20 2:00 PM-3/20/20 8:00 AM Full Plant Emergency Shutdown due to Xcel Power Outage No Components Repaired
April		
May		
June		



60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2019	Current Period Ending: 6/30/2020
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	528	568
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	1	1
Connectors 60.5422(a) & 60.487a (b)(5)	1,203	1,238
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/7/2020

Report Parameters



Reg: EPA60-0000

Compliance Grp: Inlet Gas Process

Class: All Component Classes

Date: 1/1/2020 - 6/30/2020

Compliance Group	Class Description	Added	Deleted
Inlet Gas Process	COMPRESSOR	1	0
Inlet Gas Process	CONNECTOR	37	2
Inlet Gas Process	POTENTIAL OPEN END	4	1
Inlet Gas Process	PRESSURE RELIEF DEVICE	2	0
Inlet Gas Process	PUMP	0	0
Inlet Gas Process	VALVE	46	3

Compliance Repair Delay Report**Report Date: 1/1/2020 to 6/30/2020****Print Date: 7/7/2020 1:48:12PM****Plant: AKA ENERGY - GILCREST****Regulation: EPA60-0000****Compliance Group: Inlet Gas Process**

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
2579	VALVE	0058	2/5/2020	2/14/2020	PROCESS UNIT SHUTDOWN	PER RUDY QUIROZ	9/30/2020	
2509		0058 NGL Y-Grade - T-1500 Debut To Storage Tanks			REQUIRED			

Number of Components Delayed for Compliance Group Inlet Gas Process - 1

Signature of Owner or Operator Responsible for Delay of Repair Decision

**STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS
SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000**

Company: **AKA ENERGY - GILCREST** Compliance Group: **NGL Y Grade Storage and Handlin**
Reporting Period: **1/1/2020 Through 6/30/2020** 7/7/2020

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		<i>January</i>	<i>February</i>	<i>March</i>	<i>April</i>	<i>May</i>	<i>June</i>
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	2	0	0	1	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	1	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	1	1	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	7	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	6	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period
40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

<i>Month</i>	<i># of Days</i>	<i>Comments About Outage/Shutdown/Turnaround</i>
<i>January</i>		
<i>February</i>		
<i>March</i>	18 hours	3/19/20 2:00 PM-3/20/20 8:00 AM Full Plant Emergency Shutdown due to Xcel Power Outage No Components Repaired
<i>April</i>		
<i>May</i>		
<i>June</i>		



60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2019	Current Period Ending: 6/30/2020
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	339	341
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	8	8
Connectors 60.5422(a) & 60.487a (b)(5)	1,188	1,196
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/7/2020

Report Parameters



Reg: EPA60-0000

Compliance Grp: NGL Y Grade Storage and
Handling Process

Date: 1/1/2020 - 6/30/2020

Class: All Component Classes

Compliance Group	Class Description	Added	Deleted
NGL Y Grade Storage and Handling Process	CONNECTOR	9	1
NGL Y Grade Storage and Handling Process	POTENTIAL OPEN END	4	0
NGL Y Grade Storage and Handling Process	PRESSURE RELIEF DEVICE	1	0
NGL Y Grade Storage and Handling Process	PUMP	0	0
NGL Y Grade Storage and Handling Process	VALVE	3	1

Compliance Repair Delay Report

Report Date: 1/1/2020 to 6/30/2020

Print Date: 7/7/2020 1:48:13PM

Plant: AKA ENERGY - GILCREST

Regulation: EPA60-O000

Compliance Group: NGL Y Grade Storage and Handling Process

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
2912.02 2519A	CONNECT	0061 0061 NGL Y-Grade - Pump P-5 To Truck Loading Rack	2/12/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
3034.05 2519	CONNECT	0060 0060 NGL Y-Grade Gasoline - P-6 To Truck Load Rack	2/14/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
3034.07 2519	CONNECT	0060 0060 NGL Y-Grade Gasoline - P-6 To Truck Load Rack	2/14/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
3036.06 2519	CONNECT	0060 0060 NGL Y-Grade Gasoline - P-6 To Truck Load Rack	2/14/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
3025.03 2519	CONNECT	0060 0060 NGL Y-Grade Gasoline - P-6 To Truck Load Rack	2/20/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
3049.03 2519	POE	0060 0060 NGL Y-Grade Gasoline - P-6 To Truck Load Rack	2/14/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
3044 2519	VALVE	0061 0061 NGL Y-Grade - Pump P-5 To Truck Loading Rack	2/14/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	

Number of Components Delayed for Compliance Group NGL Y Grade Storage and Handling Process - 7

Signature of Owner or Operator Responsible for Delay of Repair Decision

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000

Company: **AKA ENERGY - GILCREST**

Compliance Group: **Refrigeration Process**

Reporting Period: **1/1/2020 Through 6/30/2020**

7/7/2020

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	3	11	2	1	8	2
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	6	2	0	2	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	1	2	1	2	3	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	2	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	0	0	0	48	3
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	11	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March	18 hours	3/19/20 2:00 PM-3/20/20 8:00 AM Full Plant Emergency Shutdown due to Xcel Power Outage No Components Repaired
April		
May		
June		



60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2019	Current Period Ending: 6/30/2020
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	731	756
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	7	8
Connectors 60.5422(a) & 60.487a (b)(5)	2,474	2,560
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/7/2020

Report Parameters



Reg: EPA60-0000

Compliance Grp: Refrigeration Process

Class: All Component Classes

Date: 1/1/2020 - 6/30/2020

Compliance Group	Class Description	Added	Deleted
Refrigeration Process	COMPRESSOR	0	0
Refrigeration Process	CONNECTOR	99	13
Refrigeration Process	POTENTIAL OPEN END	19	5
Refrigeration Process	PRESSURE RELIEF DEVICE	3	0
Refrigeration Process	PUMP	1	0
Refrigeration Process	VALVE	27	2

Compliance Repair Delay Report**Report Date: 1/1/2020 to 6/30/2020****Print Date: 7/7/2020 1:48:13PM****Plant: AKA ENERGY - GILCREST****Regulation: EPA60-0000****Compliance Group: Refrigeration Process**

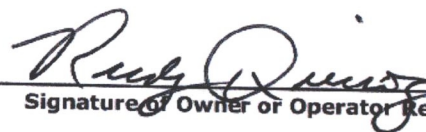
Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
3116.04 2515	CONNECT	0051 0051 NGL Y-Grade-Pumps10A/B DeethBtm toStorageTks	5/15/2020	5/28/2020	PROCESS UNIT SHUTDOWN REQUIRED PER RUDY QUIROZ	PER RUDY QUIROZ	9/30/2020	
2270.04 2509	CONNECT	0013 0013 Inlet Gas- Dehy V-110 to Dust Filter F-800	5/18/2020	5/18/2020	PROCESS SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2109.05 2512	CONNECT	0030 0030 E-440 Deeth Htr toT-1100 Deeth OVHD	5/18/2020	5/28/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2122.03 2511	CONNECT	0030 0030 E-440 Deeth Htr toT-1100 Deeth OVHD	5/18/2020	5/23/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2299.08 2508	CONNECT	0013 0013 Inlet Gas- Dehy V-110 to Dust Filter F-800	5/19/2020	5/20/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2155.01 2511	CONNECT	0030 0030 E-440 Deeth Htr toT-1100 Deeth OVHD	5/19/2020	5/20/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2155.02 2511	CONNECT	0030 0030 E-440 Deeth Htr toT-1100 Deeth OVHD	5/19/2020	5/20/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2226.03 2509	CONNECT	0030 0030 E-440 Deeth Htr toT-1100 Deeth OVHD	5/20/2020	5/28/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2108.06 2512	CONNECT	0030 0030 E-440 Deeth Htr toT-1100 Deeth OVHD	5/22/2020	5/28/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	

Compliance Repair Delay Report**Report Date: 1/1/2020 to 6/30/2020****Print Date: 7/7/2020 1:48:13PM****Plant: AKA ENERGY - GILCREST****Regulation: EPA60-0000****Compliance Group: Refrigeration Process**

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
2109.06 2512	CONECT	0030 0030 E-440 Deeth Htr toT-1100 Deeth OVHD	5/22/2020	5/28/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2040.06 2513	CONECT	0019 0019 E-420 Cold Gas Exch toT-1100 Deeth OVHD	5/22/2020	5/27/2020	DELAY DUE TO COVID-19 SOCIAL DISTANCING GUIDELINES & INABILITY TO REPAIR COMPONENT W/O CLOSE CONTACT	PER RUDY QUIROZ	7/31/2020	
1884 2515	PUMP	0051 0051 NGL Y-Grade-Pumps10A/B DeethBtm toStorageTks	5/11/2020	5/13/2020	DELAY DUE TO COVID-19 SOCIAL DISTANCING GUIDELINES & INABILITY TO REPAIR COMPONENT W/O CLOSE CONTACT	PER RUDY QUIROZ	7/31/2020	
1861 2515	PUMP	0051 0051 NGL Y-Grade-Pumps10A/B DeethBtm toStorageTks	5/18/2020	5/18/2020	DELAY DUE TO COVID-19 SOCIAL DISTANCING GUIDELINES & INABILITY TO REPAIR COMPONENT W/O CLOSE CONTACT	PER RUDY QUIROZ	7/31/2020	
1641 2504	VALVE	0038 0038 Cond Vapor-CMP C-250 VaporSkid toCMP C1-5	2/14/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2056 2511	VALVE	0015 0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP	2/17/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2155 2511	VALVE	0030 0030 E-440 Deeth Htr toT-1100 Deeth OVHD	2/18/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2113 2512	VALVE	0030 0030 E-440 Deeth Htr toT-1100 Deeth OVHD	2/18/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	

Compliance Repair Delay Report**Report Date: 1/1/2020 to 6/30/2020****Print Date: 7/7/2020 1:48:13PM****Plant: AKA ENERGY - GILCREST****Regulation: EPA60-0000****Compliance Group: Refrigeration Process**

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
2159	VALVE	0017	2/18/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2512		0017 V-215 LP Sep to T-1100 Deethanizer OVHD						
2167	VALVE	0015	2/18/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2511		0015 Inlet Gas-HP ColdSep V-200toK-600 ExpndrCMP						
2144.00	VALVE	0017	3/24/2020	3/30/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2512		0017 V-215 LP Sep to T-1100 Deethanizer OVHD						
2026.00R	VALVE	0019	3/25/2020	3/30/2020	DELAY DUE TO COVID-19 SOCIAL DISTANCING GUIDELINES & INABILITY TO REPAIR COMPONENT W/O CLOSE CONTACT	PER RUDY QUIROZ	7/31/2020	
2513		0019 E-420 Cold Gas Exch to T-1100 Deeth OVHD						
2267	VALVE	0032	5/18/2020	5/18/2020	PROCESS SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2509		0032 F-800 Inlet Gas Dust Filter to K-620 Regen CMP						
2328	VALVE	0045	5/19/2020	5/20/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
2509		0045 CMP C 1-5 To V-275 LP Condensate Tank						

Number of Components Delayed for Compliance Group Refrigeration Process - 23

Signature of Owner or Operator Responsible for Delay of Repair Decision

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000

Company: **AKA ENERGY - GILCREST**

Compliance Group: **Sulfatreat Process**

Reporting Period: **1/1/2020 Through 6/30/2020**

7/7/2020

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	1	0	0	1	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	1	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	2	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	1	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March	18 hours	3/19/20 2:00 PM-3/20/20 8:00 AM Full Plant Emergency Shutdown due to Xcel Power Outage No Components Repaired
April		
May		
June		



60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2019	Current Period Ending: 6/30/2020
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	193	193
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	0	0
Connectors 60.5422(a) & 60.487a (b)(5)	494	489
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/7/2020

Report Parameters



Reg: EPA60-0000

Compliance Grp: Sulfatreat Process

Class: All Component Classes

Date: 1/1/2020 - 6/30/2020

Compliance Group	Class Description	Added	Deleted
Sulfatreat Process	CONNECTOR	4	9
Sulfatreat Process	POTENTIAL OPEN END	0	0
Sulfatreat Process	PRESSURE RELIEF DEVICE	0	0
Sulfatreat Process	VALVE	1	1

Compliance Repair Delay Report

Report Date: 1/1/2020 to 6/30/2020

Print Date: 7/7/2020 1:48:13PM

Plant: AKA ENERGY - GILCREST

Regulation: EPA60-0000

Compliance Group: Sulfatreat Process

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
0267.01 2538	CONNECT	0009 0009 Sulfatreat from V-814/815 to F-812	2/13/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	
0250 2538	VALVE	0009 0009 Sulfatreat from V-814/815 to F-812	2/13/2020	2/26/2020	PROCESS UNIT SHUTDOWN REQUIRED	PER RUDY QUIROZ	9/30/2020	

Number of Components Delayed for Compliance Group Sulfatreat Process - 2

Signature of Owner or Operator Responsible for Delay of Repair Decision

STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000

Company: **AKA ENERGY - GILCREST**

Compliance Group: **Truck Loading Process Area**

Reporting Period: **1/1/2020 Through 6/30/2020**

7/7/2020

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		January	February	March	April	May	June
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
January		
February		
March	18 hours	3/19/20 2:00 PM-3/20/20 8:00 AM Full Plant Emergency Shutdown due to Xcel Power Outage No Components Repaired
April		
May		
June		



60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 12/31/2019	Current Period Ending: 6/30/2020
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	58	58
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	0	0
Connectors 60.5422(a) & 60.487a (b)(5)	369	368
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0

Added / Deleted Summary by Regulation (R602r)

Report Date: 7/7/2020

Report Parameters



Reg: EPA60-0000

Compliance Grp: Truck Loading Process Area

Class: All Component Classes

Date: 1/1/2020 - 6/30/2020

Compliance Group	Class Description	Added	Deleted
Truck Loading Process Area	CONNECTOR	0	1
Truck Loading Process Area	POTENTIAL OPEN END	0	0
Truck Loading Process Area	PRESSURE RELIEF DEVICE	0	0
Truck Loading Process Area	PUMP	0	0
Truck Loading Process Area	VALVE	0	0

Compliance Component Summary (R800)

Report Date: 7/7/2020

Report Parameters

Regulation: EPA60-0000

Compliance Group: All Compliance Groups



Reporting Period: 6/30/2020 - 6/30/2020

EPA60-0000 : CO2 Membrane Process

Class	Chemical State	Category	Design	Exempt	Count
CONNECT	GV	Normal	Normal	No	133
POE	GV	Normal	Normal	No	34
RELIEF	GV	Normal	NDE	No	1
VALVE	GV	Normal	Normal	No	47
					215

EPA60-0000 : Compression Process

Class	Chemical State	Category	Design	Exempt	Count
COMPR	GV	Normal	Normal	Yes	3
CONNECT	GV	Normal	Normal	No	1,016
CONNECT	GV	Normal	Normal	Yes	330
CONNECT	LL	Normal	Normal	No	1,139
CONNECT	LL	Normal	Normal	Yes	1
POE	GV	Normal	Normal	No	175
POE	GV	Normal	Normal	Yes	29
POE	LL	Normal	Normal	No	60
PUMP	LL	Normal	Normal	No	4
RELIEF	GV	Normal	NDE	No	17
RELIEF	GV	Normal	NDE	Yes	6
RELIEF	LL	Normal	Normal	Yes	1
VALVE	GV	Normal	NDE	No	3
VALVE	GV	Normal	NDE	Yes	4
VALVE	GV	Normal	Normal	No	193
VALVE	GV	Normal	Normal	Yes	53
VALVE	LL	Normal	NDE	No	6
VALVE	LL	Normal	Normal	No	119
					3,159

EPA60-0000 : Cryogenic Process

Class	Chemical State	Category	Design	Exempt	Count
CONNECT	GV	Normal	Normal	No	337
CONNECT	LL	Normal	Normal	No	596
POE	GV	Normal	Normal	No	50

Compliance Component Summary (R800)

Report Date: 7/7/2020

Report Parameters

Regulation: EPA60-0000

Compliance Group: All Compliance Groups



Reporting Period: 6/30/2020 - 6/30/2020

POE	LL	Normal	Normal	No	60
PUMP	LL	Normal	NDE	No	4
RELIEF	GV	Normal	NDE	No	2
RELIEF	LL	Normal	Normal	Yes	2
VALVE	GV	Normal	NDE	No	4
VALVE	GV	Normal	Normal	No	104
VALVE	LL	Normal	NDE	No	2
VALVE	LL	Normal	Normal	No	172

1,333**EPA60-0000 : Inlet Gas Process**

Class	Chemical State	Category	Design	Exempt	Count
COMPR	GV	Normal	Normal	Yes	1
CONNECT	GV	Normal	Normal	No	874
CONNECT	GV	Normal	Normal	Yes	29
CONNECT	LL	Normal	Normal	No	331
CONNECT	LL	Normal	Normal	Yes	6
POE	GV	Normal	Normal	No	128
POE	GV	Normal	Normal	Yes	5
POE	LL	Normal	Normal	No	34
POE	LL	Normal	Normal	Yes	1
PUMP	LL	Normal	Normal	No	1
RELIEF	GV	Normal	NDE	No	11
RELIEF	LL	Normal	Normal	Yes	6
VALVE	GV	Normal	NDE	No	1
VALVE	GV	Normal	NDE	Yes	1
VALVE	GV	Normal	Normal	No	372
VALVE	GV	Normal	Normal	Yes	10
VALVE	LL	Normal	NDE	No	3
VALVE	LL	Normal	Normal	No	186
VALVE	LL	Normal	Normal	Yes	1

2,001**EPA60-0000 : NGL Y Grade Storage and Handling Process**

Class	Chemical State	Category	Design	Exempt	Count
CONNECT	GV	Normal	Normal	No	641

Compliance Component Summary (R800)

Report Date: 7/7/2020

Report Parameters

Regulation: EPA60-0000

Compliance Group: All Compliance Groups



Reporting Period: 6/30/2020 - 6/30/2020

CONECT	GV	Normal	Normal	Yes	1
CONECT	LL	Normal	Normal	No	554
POE	GV	Normal	Normal	No	77
POE	GV	Normal	Normal	Yes	1
POE	LL	Normal	Normal	No	66
PUMP	LL	Normal	Normal	No	8
RELIEF	GV	Normal	NDE	No	12
RELIEF	LL	Normal	Normal	Yes	1
VALVE	GV	Normal	NDE	No	1
VALVE	GV	Normal	NDE	Yes	2
VALVE	GV	Normal	Normal	No	181
VALVE	GV	Normal	Normal	Yes	5
VALVE	LL	Normal	Normal	No	155

1,705

EPA60-0000 : Refrigeration Process

Class	Chemical State	Category	Design	Exempt	Count
COMPR	GV	Normal	Normal	Yes	4
CONECT	GV	Difficult	Normal	No	120
CONECT	GV	Normal	Normal	No	1,135
CONECT	LL	Difficult	Normal	No	43
CONECT	LL	Normal	Normal	No	1,262
POE	GV	Difficult	Normal	No	19
POE	GV	Normal	Normal	No	123
POE	LL	Difficult	Normal	No	11
POE	LL	Normal	Normal	No	151
PUMP	LL	Normal	Normal	No	8
RELIEF	GV	Normal	NDE	No	21
RELIEF	LL	Normal	Normal	Yes	8
VALVE	GV	Difficult	Normal	No	1
VALVE	GV	Normal	NDE	No	2
VALVE	GV	Normal	Normal	No	385
VALVE	LL	Difficult	Normal	No	1
VALVE	LL	Normal	Normal	No	369

3,663

Compliance Component Summary (R800)

Report Date: 7/7/2020

Report Parameters

Regulation: EPA60-0000

Compliance Group: All Compliance Groups



Reporting Period: 6/30/2020 - 6/30/2020

EPA60-0000 : Sulfatreat Process

Class	Chemical State	Category	Design	Exempt	Count
CONNECT	GV	Normal	Normal	No	357
CONNECT	LL	Normal	Normal	No	132
POE	GV	Normal	Normal	No	55
POE	LL	Normal	Normal	No	16
RELIEF	GV	Normal	NDE	No	7
RELIEF	LL	Normal	Normal	Yes	1
VALVE	GV	Normal	Normal	No	137
VALVE	LL	Normal	Normal	No	56

761**EPA60-0000 : Truck Loading Process Area**

Class	Chemical State	Category	Design	Exempt	Count
CONNECT	GV	Normal	Normal	No	223
CONNECT	LL	Normal	Normal	No	145
POE	GV	Normal	Normal	No	9
POE	LL	Normal	Normal	No	9
RELIEF	LL	Normal	Normal	Yes	6
VALVE	GV	Normal	Normal	No	34
VALVE	LL	Normal	Normal	No	24

450**Grand Total****13,287**